



**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2C

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
RS1765
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys' for the Mortgagee
File No. 090112B

Order Filed on December 19, 2018
by Clerk
U.S. Bankruptcy Court
District of New Jersey

In Re:

Brian M Schoener
Amy N Schoener

Case No.: 18-26593
Hearing Date: 11/13/2018
Judge: Michael B. Kaplan

**CONSENT ORDER
RESOLVING OBJECTION TO DEBTORS'
NOTICE OF REQUEST FOR LOSS MITIGATION**

The relief set forth on the following pages, numbered two (2) through (3) is hereby **ORDERED**.

DATED: December 19, 2018

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".
Honorable Michael B. Kaplan
United States Bankruptcy Judge

Page 2

Debtor: Brian M. Schoener and Amy N. Schoener

Case No: 18-26593-MBK

Caption of Order: Consent Order Resolving Objection to Debtors' Notice of Request for Loss Mitigation

This matter having come before the Court on the Objection to the Debtors' Notice of Request for Loss Mitigation by The Provident Bank, Mortgagee, by and through counsel, Pluese, Becker & Saltzman, LLC, Stuart H. West, Esquire, appearing and the Debtors, by and through counsel, Karina Pia Lucid, Esquire, having consented hereto and good cause having been shown; IT is hereby, ORDERED as follows:

1. The Debtors' request to enter into the Bankruptcy Loss Mitigation Program is withdrawn.
2. The Provident Bank will review the Debtors for loss mitigation outside of the Bankruptcy Loss Mitigation Program.
3. The Debtors have submitted a complete loss mitigation package to The Provident Bank, which is currently being reviewed.
4. The Debtors shall have six months from the entry of this Consent Order to obtain a loan modification.
5. In the event that any such mortgage modification or other consensual resolution is not available, the Debtors shall acknowledge the pre-Petition arrearages as stated in the Proof of Claim. The Debtors shall have 30 days from the date of any final notification that a modification, etc. is not available to file an amended Chapter 13 Plan to cure the pre-Petition arrearages and maintain post-

Page 3

Debtor: Brian M. Schoener and Amy N. Schoener

Case No: 18-26593-MBK

Caption of Order: Consent Order Resolving Objection to Debtors' Notice of Request for Loss Mitigation

Petition payments, or to convert the Chapter 13 Petition to one under a Chapter 7 Petition, or to surrender the property, and/or proceed with this bankruptcy case as deemed appropriate.

We hereby consent to the form and entry of the within Order.

PLUESE, BECKER & SALTZMAN, LLC

By: /s/ Stuart H. West
Stuart H. West, Esquire
Attorneys for the Mortgagee

KARINA PIA LUCID, ESQ., LLC

By: /s/ Karina Pia Lucid
Karina Pia Lucid, Esquire
Attorney for the Debtors